

CLEMENT SETH ROBERTS (SBN 209203)  
croberts@orrick.com  
BAS DE BLANK (SBN 191487)  
basdeblank@orrick.com  
ALYSSA CARIDIS (SBN 260103)  
acaridis@orrick.com  
ORRICK, HERRINGTON & SUTCLIFFE LLP  
The Orrick Building  
405 Howard Street  
San Francisco, CA 94105-2669  
Telephone: +1 415 773 5700  
Facsimile: +1 415 773 5759

SEAN M. SULLIVAN (*pro hac vice*)  
sullivan@ls3ip.com  
COLE RICHTER (*pro hac vice*)  
richter@ls3ip.com  
LEE SULLIVAN SHEA & SMITH LLP  
656 W Randolph St., Floor 5W  
Chicago, IL 60661  
Telephone: +1 312 754 0002  
Facsimile: +1 312 754 0003

*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION

SONOS, INC.,  
Plaintiff and Counter-defendant,  
v.  
GOOGLE LLC,  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Consolidated with  
Case No. 3:21-cv-07559-WHA

**SONOS, INC.'S ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED RE SONOS,  
INC.'S PROFFER OF TESTIMONY OF  
ALAINA KWASIZUR**

## I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Sonos, Inc. (“Sonos”) hereby respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed (“Administrative Motion”) in connection with Sonos’s Proffer of Testimony of Alaina Kwasizur (“Sonos’s Proffer”). Specifically, Sonos seeks to file under seal the information and/or document(s) listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Kwasizur Declaration in support of Sonos’s Proffer	Entire document	Google
Exhibit 1 to Kwasizur Declaration	Entire document	Google
Exhibit 2 to Kwasizur Declaration	Entire document	Google
Exhibit 5 to Kwasizur Declaration	Entire document	Google
Exhibit 6 to Kwasizur Declaration	Entire document	Google
Exhibit 7 to Kwasizur Declaration	Entire document	Google
Exhibit 9 to Kwasizur Declaration	Entire document	Google
Exhibit 10 to Kwasizur Declaration	Entire document	Google
Exhibit 11 to Kwasizur Declaration	Entire document	Google
Exhibit 12 to Kwasizur Declaration	Entire document	Google
Exhibit 13 to Kwasizur Declaration	Entire document	Google
Exhibit 14 to Kwasizur Declaration	Entire document	Google
Exhibit 15 to Kwasizur Declaration	Entire document	Google
Exhibit 17 to Kwasizur Declaration	Entire document	Google

## II. LEGAL STANDARD

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or non-party.” *See* L.R. 79-5(f).

## III. GOOGLE LLC’S CONFIDENTIAL INFORMATION

Sonos seeks to seal the information and/or document(s) listed in the above table because they may contain information that Google considers Confidential and/or Highly Confidential-

1 Attorneys' Eyes Only pursuant to the Protective Order entered by this Court. Dkt. 92. Sonos  
2 takes no position on the merits of sealing Google's designated material and expects Google to file  
3 one or more declarations in accordance with the Local Rules.

4 **IV. CONCLUSION**

5 In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above-  
6 listed documents accompany this Administrative Motion and redacted versions are filed publicly.  
7 A proposed order is being filed concurrently herewith. For the foregoing reasons, Sonos  
8 respectfully requests that the Court grant Sonos's Administrative Motion.

9 Dated: May 10, 2023

ORRICK HERRINGTON & SUTCLIFFE LLP  
and  
LEE SULLIVAN SHEA & SMITH LLP

11 By: /s/ Clement S. Roberts  
12 Clement S. Roberts

13 *Attorneys for Sonos, Inc.*  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28